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October 22, 2013

By Overnight Courier

Jocelyn Boyd, Chief Clerk and Administrator
Clerk's Office
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

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SC PUBLIC SERVICE
COMMISSION

Re: **Docket 2013-207-C** Petition of the North American Numbering Plan
Administrator on Behalf of the South Carolina Telecommunications
Industry for Relief of the 843 NPA


Dear Ms. Boyd:

Neustar, Inc., in its role as the North American Numbering Plan Administrator ("NANPA"), hereby submits for filing the verified Pre-filed Direct Testimony of Thomas C. Foley. Enclosed please find the original and one copy of the Testimony. Please date-stamp the return copy as received and return it in the enclosed self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned at (202) 533-2912.

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Respectfully submitted,



Kimberly Wheeler Miller
Counsel, North American Numbering Plan
Administrator, Neustar, Inc.
Kimberly.miller@neustar.biz

Before the
South Carolina Public Service Commission
Columbia, South Carolina 29210

In the Matter of the Petition of Neustar, Inc.
On Behalf of the South Carolina Telecommunications
Industry, For Approval of NPA Relief Plan for the 843
NPA

Docket 2013-207-C

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VERIFIED
PRE-FILED DIRECT TESTIMONY OF THOMAS C. FOLEY
ON BEHALF OF NEUSTAR, INC.

October 22, 2013

Pre-Filed Direct Testimony of
Thomas C. Foley
On Behalf of Neustar, Inc.

1 **QUALIFICATIONS**

2 Q1. Please state your name and business address.

3 A1. My name is Thomas C. Foley. My business address is 21575 Ridge Top Circle,
4 Sterling, VA 20166.

5
6 Q2. With whom are you employed and in what capacity?

7 A2. I am employed at Neustar, Inc. ("Neustar") as Senior Manager Data Analysis. I
8 also serve as the Numbering Plan Area ("NPA") Relief Planner for the
9 southeastern U.S. and the Caribbean. Neustar is the North American Numbering
10 Plan Administrator ("NANPA"). As a NPA Relief Planner, I am responsible for
11 initiating NPA relief planning in NPAs within the southeastern area of the United
12 States in sufficient time to prevent the exhaust of numbering resources. These
13 responsibilities include monitoring central office ("CO") code utilization trends
14 and collecting other information in order to project NPA exhaust, notifying the
15 industry and appropriate regulatory bodies of the need for NPA relief planning,
16 and conducting relief planning meetings with the telecommunications industry.
17 NANPA also prepares and forwards industry recommended relief plans to the
18 appropriate regulatory agency and provides notification of agency approved relief
19 plans to the industry in accordance with the NPA Code Relief Planning and
20 Notification Guidelines (ATIS 0300061) ("Guidelines").

21
22 Q3. Please describe your educational background and previous professional
23 experience.

1 A3. I graduated from the University of Nebraska with a Bachelor of Science degree in
2 Electrical Engineering. Subsequently, I graduated from Roosevelt University in
3 Chicago with a Masters of Business Administration. I also hold a Masters
4 Certificate in Project Management from George Washington University.
5 Prior to joining NANPA, I was employed in various positions in engineering,
6 planning, finance, and management for Centel Corporation, United Telephone and
7 Sprint Corporation. I represented my employer in industry meetings for NPA
8 relief planning and other numbering issues. I was a subject matter expert witness
9 before the Florida Commission on several occasions. In July 1999 I joined
10 Neustar as a Relief Planner and was subsequently promoted to my current
11 position. I also prepare the semi-annual NPA exhaust projections for the United
12 States,

13
14 **PURPOSE OF TESTIMONY**

15 Q4. What is the purpose of your testimony?

16 A4. I offer this testimony pursuant to the Guidelines and to explain NANPA's role in
17 the instant NPA relief proceeding.

18
19 **NANPA's ROLE IN THE NPA RELIEF PROCESS**

20 Q5. Please describe NANPA's role in this proceeding.

21 A5. NANPA is the neutral third party administrator of the North American
22 Numbering Plan pursuant to its contract with the Federal Communications

1 Commission ("FCC"). Current relief efforts for the 843 NPA first began earlier
2 this year when NANPA notified the Public Service Commission of South
3 Carolina ("Commission") and the members of the industry on January 4, 2013
4 that relief for the 843 NPA needed to be addressed. NANPA facilitated an
5 industry meeting on March 21, 2013, via conference call, for the purpose of
6 presenting NPA relief alternatives to the industry and to ultimately allow industry
7 members to come to consensus on a single relief plan to be presented to the
8 Commission. Prior to the March 21 meeting, NANPA prepared and distributed an
9 Initial Planning Document ("IPD") which described two relief alternatives for the
10 843 NPA.

11 On May 30, 2013, NANPA filed a petition with the Commission on behalf of the
12 industry notifying the Commission of the industry's consensus decision to
13 recommend to the Commission an all services distributed overlay as the preferred
14 means of relief for the 843 NPA.

15
16 Q6 When is the 843 NPA projected to exhaust?

17 A6 The 843 NPA currently is projected to exhaust during the fourth quarter 2015.
18

19 Q7. Do you have any changes you would like to make to the petition?

20 A7. No.
21
22

1 **RELIEF ALTERNATIVES**

2 Q8. Please describe Alternative #1.

3 A8. Alternative #1 – All-Services Distributed Overlay: A new NPA code would be
4 assigned to the same geographic area as the existing 843 NPA. All existing
5 customers would retain the 843 area code and would not have to change their
6 telephone numbers. Alternative #1 has a projected life of 28 years. Consistent
7 with FCC regulations, customers will dial 10 digits for all local calls.

8
9 Q9. Please describe Alternative #2.

10 A9. Alternative #2 – Two-way Geographic Split: The NPA is split into two
11 geographic areas and a new NPA is assigned to one of the areas formed by the
12 split. In Alternative #2, the proposed split boundary line runs along rate center
13 boundaries generally west to east. The split line runs from between Pineville and
14 Greeleyville Rate Centers on the west and between Georgetown and
15 McClellanville on the east. “Area A” is to the north of that line; “Area B” is to the
16 south. “Area A” has a projected NPA life of 29 years to exhaust. “Area B”, the
17 southern portion, has a projected NPA life of 27 years.

18
19 Q10. Describe the relief alternative chosen by the industry as the preferred form of
20 relief for the 843 NPA.

21 A10. The industry reached consensus to recommend to the Commission Alternative #1,
22 the all services distributed overlay, as the preferred means of relief for the 843

1 NPA. The all-services distributed overlay would superimpose a new NPA over
2 the same geographic area covered by the existing 843 NPA. All existing
3 customers would retain the 843 area code and would not have to change their
4 telephone numbers. New central office code assignments would be made from
5 the new overlay area code beginning one month after mandatory dialing begins.
6 Consistent with FCC regulations, the relief plan would require 10-digit dialing for
7 all calls within and between the 843 NPA and the new NPA. Toll calls within the
8 home NPA will be dialed using 1+10 digits. Toll calls crossing NPA boundaries
9 would require 1+10 digit dialing and operator assisted calls would require 0+10
10 digit dialing. The projected life of the new overlay NPA is 28 years.

11
12 Q11. Did the industry recommend a time frame for implementation of the overlay?

13 A11. Industry participants reached consensus to recommend to the Commission a 13
14 month schedule for implementing the all-services distributed overlay. The
15 schedule includes recommended intervals for each implementation phase. The
16 industry recommended six months for network preparation and customer
17 education followed by six months for permissive 10-digit dialing and continued
18 customer education. Mandatory dialing would begin at the end of the permissive
19 dialing period. The first code activation for codes assigned from the new overlay
20 NPA would take place one month after mandatory 10-digit dialing begins.

1 Q13. Does this conclude your testimony?

2 A13. Yes, it does.

AFFIDAVIT

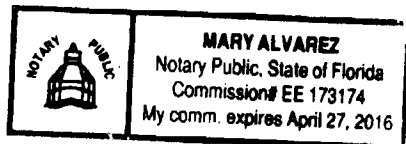
STATE OF Florida
COUNTY OF Seminole

Before me, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid personally came and appeared Thomas C. Foley who, being by me first duly sworn, deposed and said that:

1. I, Thomas C. Foley, am employed by Neustar, Inc. as Senior Manager - Data Analysis.
2. I have read my foregoing pre-filed testimony, which is dated October 22, 2013 and consists of seven pages.
3. The contents of my foregoing testimony are true to the best of my knowledge.

Thomas C. Foley
AFFILIANT

Sworn to and subscribed before me this 22nd day of October, 2013.



Mary Alvarez
NOTARY PUBLIC

My Commission Expires: April 27 2014

[SEAL]

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing verified **Pre-filed Direct Testimony of Thomas C. Foley** upon all parties included in the service list in this proceeding by electronic mail to the recipient's current electronic mail address as indicated below to:

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Dated this 22nd day of October, 2013


Kimberly Wheeler Miller

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